

UNITED STATES DISTRICT COURT
for the

Eastern District of Pennsylvania

United States of America)

v.)

Case No. 18-1409-M

Blair Strouse)

Defendant(s))

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 11 and August 16, 2017 in the county of Bucks in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 875.

*See Attachment A

This criminal complaint is based on these facts:

See attached Affidavit of Probable Cause

Continued on the attached sheet.



Complainant's signature

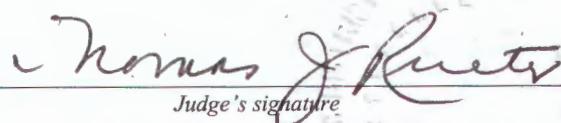
Adam Sucheski, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 9-5-18

City and state: Philadelphia, Pennsylvania



Judge's signature

The Honorable Thomas J. Reuter

Printed name and title

Attachment A

On or about August 11, 2017, defendant Blair Strouse knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure another person, that is, the defendant sent an email from the Eastern District of Pennsylvania to numerous individuals in Brazil, threatening to kill L.G., in violation of 18 U.S.C. § 875(c).

On or about August 16, 2017, defendant Blair Strouse knowingly and intentionally transmitted in interstate and foreign commerce a communication containing a threat to injure another person, that is, the defendant sent an email from the Eastern District of Pennsylvania to A.G. in Brazil, threatening to kill A.G. and her children, in violation of 18 U.S.C. § 875(c).

AFFIDAVIT OF PROBABLE CAUSE

I, Adam Sucheski, a Special Agent with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows. I make this affidavit in support of an application for an arrest warrant for Blair Strouse ("Strouse").

1. I have been employed as a Special Agent of the Federal Bureau of Investigation for over 11 years and am currently assigned to the Philadelphia FBI Division's Fort Washington Resident Agency. While employed by the FBI, I have investigated all varieties of federal criminal cases, including those involving robbery, theft, drug trafficking, and making threatening communications. I have gained experience in these areas through training at the FBI Academy, prior law enforcement training, and conducting criminal investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute arrest and other types of warrants issued under the authority of the United States.

3. The statements in this Affidavit are based on my investigation and that of other law enforcement officers. Since I am submitting this Affidavit for the limited purpose of securing an arrest warrant, I have not included every fact known to me concerning this investigation and have not included all of communications of Blaire Strouse relating to the charges. I have set forth below sufficient facts to establish probable cause to support the attached complaint, charging Blair Strouse with knowingly and intentionally transmitting in interstate and foreign commerce communications containing threats to injure another person, in violation of 18 U.S.C. § 875(c).

COMPUTERS, THE INTERNET, AND E-MAIL

4. The Internet is a worldwide network of computer systems operated by governmental entities, corporations, and universities. In order to access the Internet, an individual computer user must subscribe to an access provider, which operates a host computer system with direct access to the Internet. The World Wide Web ("www") is a functionality of the Internet which allows users of the Internet to share information.

5. With a computer connected to the Internet, an individual computer user can make electronic contact with millions of computers around the world. This connection can be made by any number of means, including modem, local area network, wireless, and numerous other methods.

6. Cellular phones and "smart phones" function similarly to computers and can run computer software and applications, create and edit files, go on the Internet, chat, text, email, and interact with others on the Internet, and store, send, and receive files, among other functions. Cellular phones and smart phones have been used by criminals to send, receive, store, and

produce emails and, as well as engage in voice, email, text, and real time chat conversations with victims and co-conspirators.

7. E-mail is a popular form of transmitting messages and or files in an electronic environment between computer users. When an individual computer user sends e-mail, it is initiated at the user's computer, transmitted to the subscriber's mail server, and then transmitted to its final destination. A server is a computer that is attached to a dedicated network and serves many users. An e-mail server may allow users to post and read messages and to communicate via electronic means.

8. Internet-based e-mail is a service provided by an electronic communication service provider allowing individuals to send and receive e-mail from any Internet connected computer, regardless of their location or Internet service provider (ISP). Individuals using Internet-based e-mail services access their accounts by "logging in" through the web-browser software installed on their computer, often by providing an account name and an associated password. Once the service provider's computers have determined the password is correct for the given account name, the individual "logged-in" can access any e-mail sent to their account, and or send e-mail to any other e-mail address accessible via the Internet.

9. "Internet Protocol address" or "IP address" refers to a unique number used by a computer to access the Internet. IP addresses can be dynamic, meaning that the Internet Service Provider (ISP) assigns a different unique number to a computer every time it accesses the Internet. IP addresses might also be static, if an ISP assigns a user's computer a particular IP address which is used each time the computer accesses the Internet.

10. When the subscriber sends an e-mail, it is initiated at the user's computer, transferred via the Internet to the provider's servers, and then transmitted to its end destination.

11. As is the case with most digital technology, communications by way of computer or smart telephone can be saved or stored on the computer used for these purposes. Storing this information can be intentional, i.e., by saving an e-mail as a file on the computer or saving the location of one's favorite websites in, for example, "bookmarked" files. Digital information can also be retained unintentionally, e.g., traces of the path of an electronic communication may be automatically stored in many places (e.g., temporary files or ISP client software, among others). In addition to electronic communications, a computer user's Internet activities generally leave traces or "footprints" in the web cache and history files of the browser used. A forensic examiner often can recover evidence suggesting whether a computer contains email software or Internet based email, drafts of email messages and documents, malware, when the computer was sharing files, and some of the files which were uploaded or downloaded. Such information is often maintained indefinitely until overwritten by other data.

BACKGROUND OF THE INVESTIGATION

12. In August 2017, I began investigating Blair Strouse (“Strouse”), a United States citizen who was living in Warminster, in the Eastern District of Pennsylvania. At that time, his estranged wife, Maria da Gama (“Da Gama”), a Brazilian citizen, contacted the FBI to report that Strouse was using electronic communications, such as email and Facebook, to threaten her and her family members.

13. Strouse is employed as a salesperson for Nicomatic, an electronic component company located in Warminster. Da Gama lives in the United States on a J1 Visa, which expired in April 2017. Da Gama and Strouse were married on September 11, 2016, in Doylestown, Pennsylvania, and do not have any children together.

14. Da Gama relayed to the FBI that numerous emails from various unknown senders were sent to her family, friends, and associates and contained threatening and harassing messages that invoked the names of her sister, Artenia Da Gama (“Artenia”), and her mother, Leonice Da Gama (“Leonice”). Da Gama believes that these emails were created to threaten Da Gama. De Gama stated that, as a result of these emails, she fears for her personal safety and the safety of members of her family.

15. On September 12 and October 12, 2017, Da Gama allowed the FBI to access her email account and download emails sent to her account. This allowed me to review the emails as received by Da Gama and ensure that they have not been altered.

16. Da Gama informed local police on multiple occasions about Strouse’s threats made on social medial towards her and her family. In February 2017, Da Gama obtained a temporary Protection from Abuse (PFA) Order against Strouse in the Bucks County Court of Common Pleas. This Order was extended initially through November 2017 and then in November 2017 was extended through November 2020. According to Da Gama, Strouse continued to threaten her and her family through Facebook and email using various aliases. Da Gama stated that she believes the various email addresses used for the threats were all actually created and operated by Strouse to threaten and harass her family.

17. Da Gama provided the FBI with copies of the emails, written in Portuguese,¹ that had been sent to her family members, friends, and associates in Brazil. The FBI has translated the emails into English as set for the below.

¹ Strouse does not speak or write Portuguese. As discussed below, Strouse used Google Translate to craft these email communications.

18. Da Gama advised me that several of the emails are fictitious variations of the actual email addresses used by Da Gama's friends, family, and associates. Several of these purportedly fictitious email addresses and display names are:

mgama5709@gmail.com (Mikaela Gama);
maylane.brito@mail.com (Maylane Santos);
alinearajuo@gmail.com (Aline Arajuo);
rnader5002@yahoo.com (Ralph Nader);
rnader4589@gmail.com (Leonice Almeida); and
cintia.m.araujo@mail.com (Cintia Arajuo).

19. These fictitious email addresses appear as the sender in numerous messages sent to Da Gama's sister, as well as other associates of Da Gama and her family.

THE THREATENING COMMUNICATIONS

20. On July 27, 2017, jtorres54011@gmail.com (display name "jtorres54011") sent an email, written in Portuguese, to associates of Da Gama's sister in Brazil. The email stated:

Hi, I'm now offering US \$5,000 to anyone who sticks it to Artenia Da Gama. It should be a serious injury. Brain damage, disfigurement, facial scars, permanent disabilities are acceptable. Payment will be made in US \$2,500 immediately after, and monthly payments of US \$500 afterwards. See attached for current photo. I'm going to concentrate the offer on other students in the coming days.

Attached to the email was a photograph of Da Gama's sister.

21. On July 30, 2017, Cintia Araujo, a friend of Da Gama's sister, received an email written in Portuguese, from address bsaget5089@mail.com (display name "Jeffery Atkns") The email was sent to numerous associates of Da Gama's sister in Brazil. The email stated:

This is a friendly reminder that anyone who gives brain damage, permanent disabilities, facial scars, or a mutation to Artenia Almedia da Gama from Juazeiro² or her mother Leonice Carlos Almeida da Gama from Sento Se.³ They'll be paid \$5,000. Current exchange rates are applicable. Images of each one are attached. (emphasis original).

² Range of Juazeiro is an area of Brazil where Da Gama's sister resides.

³ Sento Se is the area of Brazil where Da Gama's mother resides.

Attached to the email was a photograph of Da Gama's mother and sister.

22. On August 7, 2017, Cintia Araujo, a friend of Da Gama's sister, received an email written in Portuguese, from address mgama5709@gmail.com (display name "Mikaela Gama") which she forwarded to Da Gama's sister. Da Gama advised that this was not the known email address of her other sister named Mikaela. The email was addressed to three friends of Da Gama's sister and stated:

Please. I am just asking you to talk. I'm going to do that. Obviously, I don't expect that her teachers will hurt Artenia. But I am and we will find the right people. I'm going to find criminals. I'm going to find them. When I do it, Artenia's going to get hurt. If we simply talk, we can avoid that. I just want to talk, and I promise that everything will stop. But I can't trust in everything they did so I will continue talking with.

23. On August 9, 2017, several friends and associates of Da Gama's received an email, written in Portuguese, from address jtorres54011@gmail.com (display name "jtorres54011"). The email was addressed to approximately 27 students and employees of the University in Brazil where Da Gama's sister is a student. The email stated:

All the evidence from these past weeks has been shown to a judge today. And the judge decided what I'm doing is perfectly legal! Praised be God!! I'm going to continue to give you updates. But I will have to find a real criminal to give Artenia brain damage.

24. On August 11, 2017, numerous associates and friends of Da Gama's received an email written in Portuguese from jtorres5409@mail.com (display name "Jesse Torres"). The email was addressed to approximately 20 students and employees of the University in Brazil. The email stated:

This weekend, I'm going to concentrate on finding someone to kill Leonice Almeida da Gama. It will be easier to find someone to kill her. It's easier to escape after killing her. She's going to die. This will be Artenia's fault. Artenia will be destroyed. Her tears make me so happy. If she opts to speak with me, (...) to stop that. Until then, Leonice's death. 5000 to attack Leonice.

25. On August 16, 2017, an email from makavelitobe@yahoo.com (display name "makavelitobe") was sent to Da Gama's sister, Artenia da Gama. It was written in English and stated:

I just do not want you to live in Bucks county . . . I will never let you live here. You will not survive . . . I will kill you Artenia. I will fucking find you, I will find your children and I will kill them before I kill you . . . I will fucking kill you Artenia. I will find someone to attack your mother and give her brain damage. You will feed her, because she will not be able to feed herself. Lets continue our relationship because you do not want a divorce. You do not want to talk. Let us keep doing this because I love it. Lets be honest. It makes me happy to try to kill you. . . . I will have my people in Juazeiro find you.

26. On August 17, 2017, Da Gama's sister received an email, written in English, from bstrou@gmail.com (display name "Blair Strouse"), which stated:

I will not stop acting the way I do. You have motivated me so much more. I will be more focused to find someone to attack Mika⁴ and your mother. I will focus more on this. You have given me the motivation. Only you can stop it....

Da Gama advised that bstrou@gmail.com is an email address that Strouse used when they were dating.

27. On September 13, 2017, Da Gama's sister received an email from jtorres5408@mail.com (display name "Jessica Torres"), which stated, in English:

"I will find you. I am going to murder you. This will not stop until I do. See you soon."

ADDITIONAL INVESTIGATIVE ACTIVITY

28. On August 22, 2017 and August 28, 2017, an undercover FBI employee (the "UC") sent emails (in English) to bsaget5089@mail.com and jtorres54011@gmail.com in response to an email requesting someone to injure Artenia Almeida Da Gama or Leonice Almeida Da Gama. The UC stated, "I am interested if this is not a joke." On September 9, 2017, jtorres54011@gmail.com responded (in Portuguese) and asked the UC where he was and if he knew Artenia. Over the next month, jtorres54011@gmail.com (JT) and the UC continued to communicate, with the UC offering to travel to Brazil to provide the services requested by JT. JT declined the offer. JT said, among other things, that he "has people in Brazil too. It is like piranhas . . . ;" and "I am just hoping my wife does not get deported. The part in Brazil is taken care of dude. I just have to wait for the right time"

⁴ Mika is believed to be the abbreviated name for Mikaela, another of Da Gama's sisters.

29. On September 11, 2017, I received an email sent to my official FBI email account from Joao Jose de Simoni Gouveia, a professor of animal breeding and genetics in a Brazilian Federal University (Federal University of Vale do São Francisco – UNIVASF). The professor advised that he and his family, as well as other staff and students from Federal University of Vale do São Francisco, located in Petrolina, Pernambuco, Brazil are receiving death threats (primarily against members of Da Gama's family) from multiple email addresses, including jtorres5408@mail.com; jtorres5409@mail.com; cintia.m.araujo@mail.com; jtorres54011@mail.com; maylane.brito@mail.com; alinearajuo@gmail.com; mgama5809@gmail.com; and rnader4589@gmail.com. The professor further advised, and I have confirmed, that he has reported the threats to the Brazilian Federal Police. The professor's email address, joao.gouveia@univasf.edu.br, was in fact included in some of the threatening emails described in this Affidavit.⁵

30. On September 20, 2017, the FBI's Legal Attaché interviewed Leonice Da Gama, the mother of Da Gama. Leonice Da Gama relayed that she has been receiving threatening emails from various addresses. Leonice Da Gama said that she thinks that Blair Strouse is using fictitious email addresses to send these emails. Leonice Da Gama provided copies of threatening emails to the Legal Attaché. These emails were from "Jesse Torres" jtorres5409@mail.com, "Maria Passos" passosmaria362@gmail.com, and "Jeffry Atkins" bsaget5089@mail.com. She said that the messages seek someone to kill or rape Leonice Da Gama and her daughter, Artenia Da Gama.

31. Leonice Da Gama stated that she fears for her personal safety and the safety of members of her family. Leonice Da Gama believes that Strouse is threatening her and her family solely to get at her daughter, Maria Da Gama.

32. Also on September 20, 2017, Artenia Da Gama was interviewed by the FBI's Legal Attaché. Artenia Da Gama confirmed that she and other individuals associated with her (including students at her university) are receiving numerous threatening email messages from various email addresses (as described above). Artenia Da Gama said that she believes that the sender is Blair Strouse, in part because the threats began after her sister, Maria Da Gama, ended the relationship with Strouse. She said that she believes that Strouse is targeting her in an attempt to circumvent a protective order in the United States. Artenia also stated that she fears for her personal safety and the safety of members of her family.

33. Records from "1 and 1 Mail and Media" related to email addresses bsaget5089@mail.com, jtorres5408@mail.com and jtorres5409@mail.com reflect the following: Between July 1, 2017 and September 22, 2017 all three addresses have been accessed through the same IP address, 100.34.73.145.

⁵ The professor's wife is also a teacher at the same school and she provided similar information to the Brazilian authorities about the threatening emails.

34. Records from Verizon related to IP address 100.34.73.145 establish that the subscriber and billing address is Victor Rosado, 436 Madison Avenue, Warminster, Pennsylvania 18974 -- the residence of Blair Strouse. Da Gama also stated that she and Strouse resided at this address and that home is owned by Victor M. Rosado and Maria B. Castano.

35. Records from Yahoo Holdings establish that the email address, makavelitobe@yahoo.com, is held by Blair Strouse and was established in 2004. The account, from the same IP address discussed above --100.34.73.145, was accessed as late as October 7, 2017.

36. Verizon records also confirm that various emails between the UC and Strouse (from bsaget5489@mail.com) concerning Strouse's offer to hire an individual to carry out his threats were also from the same IP address -- 100.34.73.145.

37. Pennsylvania Department of Motor Vehicles records confirm that Strouse was living at 436 Madison Avenue, Warminster, Pennsylvania.

38. On December 15, 2017, a search warrant was executed at 436 Madison Avenue, Warminster, Pennsylvania. During the searches, various electronic items were seized. The items included a Samsung Galaxy S5 cellular telephone, two laptop computers – including a Lenovo laptop, a GPS tracking device and a Samsung Galaxy II cellular telephone.

39. Also on December 15, 2017, Blair Strouse was interviewed at his place of employment, Nicomatic, located at 165 Veterans Circle, Warminster, Pennsylvania. During the interview, Strouse stated that he was the only person with access to his computers and cellular telephone. Strouse was found to have a Samsung S5 telephone on his person (which was used to send some of the threatening emails discussed above), and a Lenovo laptop at his residence. Strouse stated that he has used email accounts bstrou@gmail.com and checkmatestheshoes@outlook.com for general communication and ebay transactions.

40. Strouse admitted that he created approximately ten email accounts from the Lenovo laptop to communicate with Da Gama's family and that he does not speak Portuguese. Strouse claimed not to recall the details of the accounts he created, but admitted to sending messages to various members of Da Gama's family, as well as professors and government entities in Brazil. Strouse stated that he sent messages to these individuals in an attempt to obtain a divorce from Da Gama. Strouse stated that any messages that were sent were "jokes" between him and the individuals he sent the messages to.

41. Strouse claimed that he did not send the messages with Leonice Da Gama's face Photoshopped onto a nude body, although he attempted to do it and was not successful. Strouse believed that Da Gama or her family sent these and possibly other messages. Strouse was asked about an email which was sent to Joao Gouveia, in which there was a threat to kill a dog. Strouse replied that the email "gave them [the recipients] something to talk about" and was funny to him.

42. Records obtained from Microsoft, Yahoo!, 1 & 1 Mail and Media and Google for the email accounts detailed above (connected to Blair Strouse) reflect that multiple messages discussed above were recovered in full and draft status from the four email service providers.

43. On or about February 17, 2018, your Affiant reviewed the results of the forensic exams of the items seized following the December 15, 2017, search warrant. Among other items, agents recovered a document entitled, "MAR," on the Lenovo laptop. The multiple page document contains, in part, the following:

"She never loved me. I get so upset now about us even being together. That is why I hurt her family. If she did come back to me, I wanted it to be as awkward for her family as for me . . . Getting a divorce from you is my highest priority, that will take much time because of what you have done and are doing, My second priority is making your family suffer because of what you have done. I have nothing more to say, if you want your family to suffer, let them."

44. In addition, various portions of the emails discussed in this affidavit were recovered from the Lenovo laptop, which included the English and Portuguese translations via Google Translate as well as images of Artenia and Leonice Da Gama which were attached to several of the emails.

45. Between February 9, 2018 and March 17, 2018, Strouse and your Affiant have been in contact via email and in person. On March 8, 2018, Strouse wrote to your Affiant, "I would like to say that if charges are brought against me I am not looking to fight them. I will also look to receive the maximum sentence... I never threatened anyone in this country, and never would ... That is why I would agree to any deal that you say I have committed a crime as long as I can have the maximum sentence."

46. On June 6, 2018, Strouse appeared before the Honorable James McMaster of the Bucks County Court of Common Pleas to respond to a complaint filed by da Gama alleging a violation of the PFA discussed above in paragraph 16. During the hearing, Da Gama and her attorney stated that Strouse had sent emails to her family members in violation of the PFA. Strouse admitted to the violation, asked for the maximum sentence, and the court found him in violation of the PFA. The court then sentenced Strouse to six months in prison and immediately remanded him. Your Affiant later contacted the Bucks County Prison and was advised that Strouse would be in custody until at least September 6, 2018.

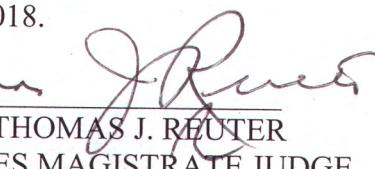
CONCLUSION

47. Based on the above, I submit that there is probable cause to believe that, as set forth in the attached complaint, Blair Strouse knowingly and intentionally transmitted in interstate and foreign commerce communications containing threats to injure other persons, in violation of 18 U.S.C. § 875(c).

49. I therefore respectfully request that the attached complaint and warrant be issued authorizing the arrest of Blair Strouse.


Adam Sucheski
Special Agent
Federal Bureau of Investigation

Sworn and subscribed
before me this 5 day
of September, 2018.


HONORABLE THOMAS J. REUTER
UNITED STATES MAGISTRATE JUDGE